

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CASE NO.: 3:24-CR-136-KDB-SCR**

UNITED STATES OF AMERICA

v.

PETER ANTHONY THOMAS

**MOTION TO PERMIT TRAVEL TO THE
MIDDLE DISTRICT OF FLORIDA**

Now comes the Defendant, Peter Thomas, through counsel, and requests that this Court permit him to travel to the Middle District of Florida between April 11, 2025, until April 13, 2025, for work. In support of this motion, the defense states:

1. The defense has consulted the Government who has no objection to this Motion.
2. The Defendant, Peter Thomas, is under the supervision of United States Probation and is permitted to travel between the Northern District of Georgia, the Southern District of Florida, and the Western District of North Carolina.
3. Mr. Thomas is a public figure and paid to make appearances at events by event promoters.
4. Mr. Thomas was engaged to appear at an event in Tampa, Florida on Friday, April 11, 2025. The promoter has purchased non-refundable tickets for this event, promoted Mr. Thomas' appearance, and made substantial

- deposits to the event venue. (See promotional materials attached as Exhibit A and ticketing arrangements attached as Exhibit B).
5. Mr. Thomas was unaware that Tampa was not within the Southern District of Florida but is in the Middle District of Florida and which requires permission to travel.
 6. Appearing at events such as this scheduled event is part of Mr. Thomas' employment.
 7. Mr. Thomas has been compliant with all other terms of his supervision.
 8. As indicated in the travel documents attached, Mr. Thomas is scheduled to leave Atlanta on April 11, 2025, and return April 13, 2025.

For the foregoing reasons, the Defense requests that this Honorable Court permit Mr. Thomas to travel to the Middle District of Florida on April 11, 2025, through April 13, 2025. All other conditions of Mr. Thomas' supervision will remain in effect.

Respectfully submitted,

/s/ C. Melissa Owen

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